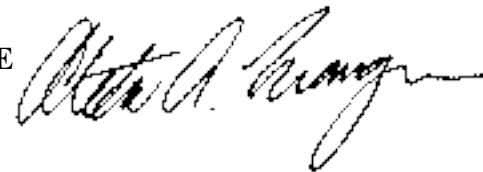


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION



DENISE SAMPLES,

Plaintiff,

v.

MIDLAND CREDIT MANAGEMENT,  
INC., MIDLAND FUNDING, LLC, and  
ENCORE CAPITAL GROUP, INC.,

Defendants.

Civil Action No. 3:12-CV-99

**DEFENDANTS' MOTION TO STAY INITIAL CASE  
MANAGEMENT CONFERENCE AND DISCOVERY**

COME NOW Defendants, Midland Credit Management, Inc. ("MCM"), Midland Funding, LLC ("Midland Funding") and Encore Capital Group, Inc. ("Encore") (collectively hereinafter "Defendants"), by and through undersigned counsel of record, Balch & Bingham LLP, and file a Motion to Stay Initial Case Management Conference and Discovery in the above numbered and styled cause, and in support thereof would show unto this Honorable Court the following:

1. The Initial Case Management Conference is currently scheduled for May 4, 2012, with discovery scheduled to proceed thereafter.
2. On March 2, 2012, Defendants filed a Motion for Judgment on the Pleadings or, in the alternative, Motion to Dismiss ("Dispositive Motion") regarding the express language of MCM's initial collection letter attached as an exhibit to Plaintiff's Complaint.
3. The Dispositive Motion has been fully briefed on the legal issues.